

PUBLIC SUBMISSION

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Docket: EPA-HQ-OPP-2013-0226

Petition to Establish Tolerances for Chemical Flupyradifurone - First Food Use

Comment On: EPA-HQ-OPP-2013-0226-0007

Public Participation Memorandum for New Active Ingredient Flupyradifurone

Document: EPA-HQ-OPP-2013-0226-0026

Comment submitted by K. Flanders

Submitter Information

General Comment

My comment is in reference to the dire need for flupyradifurone on all types of sorghum. Recently, the aphid *Melanaphis sacchari* has switched hosts from sugarcane to sorghum. *Melanaphis sacchari* is now the most serious pest of sorghum in the southern United States from Texas and Oklahoma east to South Carolina and Florida. Left untreated, the aphid exceeds economic injury levels in most cases, resulting in plant death or severely reduced yields. If damaging levels occur before heading, heads will not be formed and total yield loss occurs. No currently labeled insecticides provide adequate control of this pest, with one exception. That insecticide, chlorpyrifos, can be partially effective at the highest allowable rate if it is applied when aphid populations are not too high. The highest rate has a 60 day post harvest interval, which means the insecticide is of little practical use, except early in the season. Flupyradifurone has been shown to be highly effective against *Melanaphis sacchari* and has a very favorable environmental profile. Sorghum producers desperately need an effective control for *Melanaphis sacchari*. I recommend that the use of this active ingredient be approved by the EPA.

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